

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

UNITED STATES OF AMERICA)	
)	
v.)	Docket No. 20-cr-40036-TSH
)	
)	
VINCENT KIEJZO)	

ASSENTED-TO MOTION TO EXTEND DEADLINE TO FILE MOTIONS

The defendant, Vincent Kiejzo, respectfully requests that the May 23, 2022 filing date for substantive motions (namely, the defendant's motion to suppress and his motion for a Franks hearing) be extended, and that he be permitted to file same on June 1, 2022.

As grounds, undersigned counsel state that the parties submitted a status report prior to the final status conference in this case and requested a motion to suppress filing date of June 1, 2022. *See* D.E. # 159, ¶ III. At the April 14, 2022 final status conference, the court set a filing date for the defendant's motion to suppress of May 23, 2022. At that time, the government informed the court that it expected to be on trial during the last week of May, and again in June, and would likely need to seek an enlargement of time for its anticipated response(s) to the defendant's motions. *See* D.E. # 161, ¶ (c). Undersigned counsel have since been diligently drafting the substantive motions, but due to unforeseen delays related to illness and related quarantine periods, require additional time to submit comprehensive pleadings.

Pursuant to Local Rule 7.1, counsel conferred with AUSA Kristen Noto about this request for an extension, and understands that the government assents to the defendant's filing on June 1, 2022. Undersigned counsel would also assent to an enlargement of time if the government is occupied with trial during this time. Finally, the period of time from the final status conference through the initial pretrial conference before the District Judge has been

excluded under the interests of justice provision of the Speedy Trial Act, and that zero days are chargeable against the statutory speedy trial clock. *See* D.E. # 161, ¶ (d).

VINCENT KEIJZO
By His Attorneys,

/s/ Sandra Gant
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CERTIFICATE OF SERVICE

I, Sandra Gant, hereby certify that this document filed through the ECF system will be sent electronically to the registered participant(s) as identified on the Notice of Electronic Filing (NEF) on May 20, 2022.

/s/ Sandra Gant
Sandra Gant